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## Rapaport Law Firm

## **MEMO ENDORSED**

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July 10, 2024

## **BY ECF**

Hon. Edgardo Ramos United States District Judge Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 The parties' request for an extension of time to submit their settlement agreement for *Cheeks* review, until August 9, 2024, is granted. SO ORDERED.

Edgardo Ramos, U.S.D.J. Dated: 7/11/24

New York, New York

Re: Zamora Amores v. Gamham NY Corp. et al. Case No. 23-cv-07615 (ER)

Dear Judge Ramos:

We are counsel for Defendants in the above-referenced case, wherein Plaintiff asserts wage claims under the FLSA and NYLL. Pursuant to Your Honor's Order of June 12, 2024, the parties were provided until July 12, 2024, to submit a signed settlement agreement and *Cheeks* application. We write jointly with counsel for Plaintiff to respectfully request that the Court grant an extension of the foregoing deadline by four weeks to August 9, 2024.

The reason for this request is because counsel for Plaintiff will be out of town, and because Defendants' counsel is undergoing a medical procedure and necessitates additional time to negotiate the parties' draft agreement and for the parties to execute same. No other deadlines or scheduled appearances will be impacted by this requested extension. This is the first request for an extension of this deadline.

We thank the Court for its time and attention to this case.

Respectfully submitted,

/s/Marc A. Rapaport

Marc A. Rapaport

cc: All Counsel of Record via ECF